

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA)
) Case No. 3:22-cr-00072
v.) ALETA A. TRAUGER
) Judge, U.S. District Court
KALUM ALEXANDER)

**KALUM ALEXANDER'S UNOPPOSED MOTION TO CONTINUE HIS
JUNE 21, 2022, TRIAL AND EXTEND THE RELATED FILING DEADLINES**

COMES now, the accused, **KALUM SHAMAR ALEXANDER**, through counsel, Assistant Federal Public Defender, Isaiah S. Gant, and moves this Honorable Court to enter an order continuing the June 21, 2022, trial of his case and extend the related filing deadlines to a date not less than ninety (90) days from the date granting this Motion. In support of the foregoing Motion, it is respectfully represented to this Honorable Court the following: On February 28, 2022, a Federal Grand Jury convened in the Middle District of Tennessee, Nashville, Tennessee, returned a multiple-count indictment against Kalum Alexander alleging violations of federal law. (DE 1.) Mr. Alexander appeared before the Honorable Alistair E. Newbern, United States Magistrate Judge, April 13, 2022, for an initial appearance and arraignment. Mr. Alexander, through counsel, entered a plea of not guilty. (DE 12.) Thereafter, by order of this Court,

trial in this case is scheduled to commence June 21, 2022, at 9:00 a.m. Likewise, by that same order, various filing deadlines were designated. (DE 18.)

18 USC § 3161(h)(7)(B)(iv), Federal Rules of Criminal Procedure, vests this Court with the authority to grant a continuance at the request of the accused or his counsel if the Court finds that the ends of justice served by granting such request outweighs the best interest of the public and the accused in a speedy trial, taking into account the exercise of due diligence.

Undersigned counsel is not in the position to proceed to trial June 21, 2022. With the return of a flood of indictments since the decline in COVID-19 infection numbers by the grand jury, counsel's current caseload has increased exponentially. Discovery review, pretrial motion deadlines, field investigations, and client-relation duties in other cases have prevented undersigned counsel from being able to devote the necessary time to prepare for trial in this case. Counsel has exercised due diligence to prepare for trial in this case without success. Granting a continuance in this case to afford counsel time to adequately prepare for trial is in the best interest of the public and Mr. Alexander.

Counsel for Mr. Alexander has conferred with counsel for the government, Assistant United States Attorney, Dwight Artis, who has granted counsel the

liberty of informing the Court that the government has no opposition to the granting of this Motion.

An executed Speedy Trial Waiver prepared pursuant to the Middle District of Tennessee's *Plan for the Prompt Disposition of Criminal Cases* will be filed immediately upon receipt.

WHEREFORE, for the above and foregoing reasons, it is respectfully prayed that this Honorable Court enter an order continuing the trial in this case currently scheduled to commence June 21, 2022, at 9:00 a.m., and extending the related filing deadlines to a date not less than ninety (90) days from the date granting this Motion.

Respectfully prayed and submitted,

/s/ Isaiah S. Gant
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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2022, I electronically filed the foregoing *Unopposed Motion to Continue the June 21, 2022, Trial and Extend the Related Filing Deadlines* with the U.S. District Court Clerk by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: Dwight Artis, Assistant United States Attorney, 719 Church Street, Suite 3300, Nashville, Tennessee, 37203.

/s/ Isaiah S. Gant

ISAIAH S. GANT